

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**VOTER REFERENCE FOUNDATION,
LLC,**

Plaintiff,

v.

Case No: 1:22-cv-00222-JB-KK

**RAÚL TORREZ, in his official capacity as
New Mexico Attorney General, and
MAGGIE TOULOUSE OLIVER, in her
official capacity as
New Mexico Secretary of State,**

Defendants.

STIPULATED MOTION FOR EXTENSION TO FILE DISPOSITIVE PRE-TRIAL MOTIONS

Defendants New Mexico Attorney General Raúl Torrez and New Mexico Secretary of State Maggie Toulouse Oliver move for a 14-day extension, until March 30, 2023, to file dispositive pre-trial motions (other than discovery motions). In support of the Motion, Defendants state as follows:

1. The scheduling order currently has set March 16, 2023 as the deadline to submit any pre-trial motions other than discovery motions.
2. While Defendants submitted a Motion to Stay the Deadlines in the scheduling order while the appeal of the Preliminary Injunction is pending, which was denied, this request differs because it is not seeking a stay of the deadline, only an extension for three weeks.
3. Several considerations warrant an extension of time to file dispositive pre-trial motions:

a. Defendants' counsel will be on leave for the better part of the month of March. Ms. Schremmer will be out of the country from March 10 to March 19; Ms. Lecocq will be on leave from March 17 to March 22, and Mr. Herrera recently returned from extended leave.

b. Defendants' counsel has a number of other professional obligations that conflict with the existing deadline for these motions, including submissions in a trial on the written record in *Republican Party of N.M. v. Balderas*, 1:11-cv-900 (D.N.M), due March 10, 2023 and the reply briefing for the appeal on the preliminary injunction on this matter (No. 22-2101) due on March 15, 2023.

c. Finally, the Attorney General's Office is still undergoing a transition in administrations, which has resulted in significant changes in staff and delays in review by the front office, which is required when the Attorney General is a party.

d. Pursuant to D.N.M.LR-Civ. 7.2, Defendants sought Plaintiff's position on this motion and Plaintiff does not oppose the proposed extension.

Respectfully Submitted:

By: /s/Erin E. Lecocq
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CERTIFICATE OF SERVICE

I certify that on March 10, 2023, I served the foregoing on counsel of record for all parties via the CM/ECF system.

/s/Erin E. Lecocq